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Union Oil Company of California Chicago Refinery Lemont, Illinois 60439 Telephone (312) 257-7761

ENV 154~80

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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Hon Runge



November 17, 1980

U.S. EPA - Region V RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

## Gentlemen:

Please find attached a completed form for "Part A - RCRA Permit Application", as required by Section 3005 of the Resource Conservation and Recovery Act, for Chicago Refinery.

Several sections of the RCRA regulations are unclear and confusing. In recognizing this problem, EPA has promised technical amendments as well as regulatory interpretive memoranda (RIMS). Unfortunately, there have been no amendments or RIMS published in the Federal Register to date. In the absence of official guidance from EPA, and with the November 19, 1980 deadline quickly approaching for Part A interim status application, Union Oil Company has made what we consider to be reasonable and technically sound interpretations consistent with our understanding of the spirit and intent of the RCRA regulations. Specifically, Union Oil has made the two following basic interpretations.

- 1) Hazardous waste from a permitted wastewater treatment system is not subject to storage and treatment requirements (Part 264) until the hazardous waste is removed from the totally enclosed treatment system.
- 2) Listed chemicals used for laboratory analyses and discharged to a permitted wastewater treatment system are not subject to treatment requirements (Part 264).

When, and if, guidance is forthcoming from EPA in the Federal Register, Union Oil will amend its interim status application (if necessary) to make it consistent with EPA's interpretation. In the absence of any direction to the contrary from EPA, Union Oil will continue to operate within the above interpretation.

Very truly yours,

H. D. Haas, Supervisor Environmental Services

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C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility lother in A or B above) which will res waters of the U.S.? (FORM 2D)			χ
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X	23	X 70	F. Do you or will you inject at this municipal effluent below the low taining, within one quarter mil underground sources of drinking or the state of the state o	vermost stratum con- le of the well bore,		X 27
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		Х		H. Do you or will you inject at this cial processes such as mining of process, solution mining of mine tion of fossil fuel, or recovery o (FORM 4)	sulfur by the Frasch erals, in situ combus-		х
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						_	
B - Process crude oil to finished pe	troleum pr	oducts	such a	ıs gasoli	ine, fue	l oils,	and
other miscellaneous products.							
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II. CERTIFICATION (see instructions)				والمدنا عند علما			
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SPACE FOR A	ADDITIONAL PROCESS CODES OF	R FOR DESC	RIBING OTHER PRO	DCESSES (code	"TO4"). FOR EACH PROCESS ENTERED HERE
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basis. For eac					uantity of that waste that will be handled on an annual uantity of all the non-listed waste(s) that will be handled
		ed in column	B enter the unit of	measure code.	Units of measure which must be used and the appropriate
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to indicate For non- contained that chara Note: F:	hazardous waste: For each listed le how the waste will be stored, treate listed hazardous wastes: For each in Item III to indicate all the projecteristic or toxic contaminant.	ed, and/or dis characteristic cesses that w g process cod	posed of at the facilit or toxic contaminan ill be used to store, t des. If more are need	y. t entered in col reat, and/or dis ed: (1) Enter ti	ode/s/ from the list of process codes contained in Item III lumn A, select the code/s/ from the list of process codes pose of all the non-listed hazardous wastes that possess the first three as described above; (2) Enter "000" in the per and the additional code/s/.
2. PROCESS	DESCRIPTION: If a code is not lis	ted for a pro	cess that will be used,	describe the pre	ocess in the space provided on the form.
			·		NUMBER Hazardous wastes that can be described by
re than one C 1. Select one quantity ( 2. In column "included	PA Hazardous Waste Number shall be of the EPA Hazardous Waste Number the waste and describing all the pr	e described o pers and enter ocesses to be EPA Hazard ries on that li	n the form as follows it in column A. On t used to treat, store, a ous Waste Number the.	: he same line co nd/or dispose o nat can be used	mplete columns B,C, and D by estimating the total annual f the waste.  to describe the waste. In column D(2) on that line enter
AMPLE FOR	COMPLETING ITEM IV Ishown in the shaving from leather tanning at	n line number nd finishing a 00 pounds pe	s X-1, X-2, X-3, and , peration. In addition, r year of each waste.	X-4 below! — A the facility will The other was	facility will treat and dispose of an estimated 900 pounds treat and dispose of three run—listed wastes. Two wastes te is corrosive and ignitable and there will be an estimated
A. EPA	· · · · · · · · · · · · · · · · · · ·	C. UNIT			D. PROCESSES
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A Form 3510-3 (6-80) PAGE 2 OF 5 CONTINUE ON PAGE 3

included with above

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NOTE: Photocopy this , age before completing ou have more	than 26 wastes to Est.	♥   Form Approved OMB No. 158-S80004
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IV. DESCRIPTION OF HAZARDOUS WASTES (cont  A. EPA HAZARD. B. ESTIMATED ANNUAL  OF MER	[	), PROCESSES
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FACILITY DRAWING				19.3	CO.	(1) (1)		
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PHOTOGRAPHS			Marie men	مناب مشد		نده معطمة		100
III existing facilities must include photographs (aerial of eatment and disposal areas; and sites of future storage						ing st	orage,	56
II. FACILITY GEOGRAPHIC LOCATION			PROBLEM ST					1
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HI. FACILITY OWNER			72 - 74 15	72		) (1) (1)	THE STATES	
<ul> <li>A. If the facility owner is also the facility operator as liste skip to Section IX below.</li> <li>B. If the facility owner is not the facility operator as lister</li> </ul>				n "X	" in the I	01 XOC	the left	t and
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USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

V. FACILITY DRAWING (see page 4)	
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Shown on Attached Refinery Map.	
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EPA Form 3510-3 (6-80)	PAGE 5 OF 5

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